

**CONFIDENTIAL**  
**ATTORNEY - CLIENT**  
**PRIVILEGED**

**SECRET**

6 June 73.

**The Goodrich Suit Evaluation**

**Policy:** Evaluate situations before planning actions and handling.

Investigate and thoroughly prepare all legal actions before acting.

Thoroughly prepare legal actions; wins are proportional to preparations.

**SITUATION :** Suit lodged against G. of S. for 500 million by a Goodrich of San Francisco, including a Class Action.

**DATA :** A preliminary and a further surface study of this case reveals long strings of omitted data and omitted preparations.

An evaluation was omitted, one that is correctly done.

The advices by Intelligence show gross omissions, even the normal data surveys of individuals involved.

The plaintiff, his cohorts and attorneys are omitted totally as targets in the legal planning.

A wrong target exists re books. This is also dropped out time. Nothing that can be done to books now will help THIS suit. 1 to 4 of ltr 4 June 73 apply with realism to FUTURE suits but would have little bearing on this suit.

The attorney planning, while excellent in itself, is not, however adjusted to THIS suit and applies to any such suit. Omitted are compromising actions that would cause the suit to be thrown out such as conspiracy, government instigation and other factors. And these are omitted because routine intelligence is omitted and because an evaluation has been omitted.

A gross planning error exists. It is assumed that the opposing side is laying a groundwork to govt destruction of Sen. the exact steps of how this COULD be done are laid out. There is no factual evidence that this situation really exists, only that the plaintiff may hope it could exist. The exact error is, as a General, assuming (out of one's own specific knowledge) that the enemy will make certain splendidly planned step. which will lead him to inevitable victory. But the enemy may not have that knowledge. And may very well have entirely different things in mind. Then to place all one's defense so as to repel that hypothetical attack but not solidly meet the existing attack can lead to a severe defeat. dropped out time, wrong sequence, wrong target.

Omitted is a bright idea that will undo all this and this again is omitted because of very little (omitted) normal intelligence like credit reports, familial relationships, past criminal records, involvement with earlier fraudulent suits, possible disbarments, sources of data, sources of finance.

G EVAL

Omitted by the plaintiff are actual plaintiffs if any. False data is found in the early and scanty intelligence reports; it is alleged govt agencies are in full cry including foreign governments; yet as to agencies, "nobody has answered yet" from these agencies.

"Somebody very big" is back of all this BUT their suit is badly prepared by legal estimation and full of technical faults. These are conflicting facts as a "very big" would not be pushing a faulty filing or allowing one.

Omitted are any transcripts of Sr org members or those in other orgs who might have had to deal with Goodrich.

File A. is excellently summarised. By the evidence to hand it is not being fully used, as it contains data in itself which would successfully terminate this suit on its merits and when well examined and USED removes danger from any actual trial as the plaintiff severely injured his head many times BEFORE processing and also fell from a motorcycle and hurt his head in the earliest period of processing. But more importantly he planned to destroy Sen on 25 August 69 for which record and a witness exist and yet refused refund and continued on, thus proving his sole interest was to destroy Sen.

Examining the complaint and the books quoted, the outpoints are dropped out time and false reports, of which the dropped time is also falsified.

The plaintiff signed two success stories available in record.

The wife Lois Goodrich shows extreme hostility and moves in and out, back and forth, per Record A. She is a trifle domineering, threatens with "Federal Marshals" and other officials and is the source of this delusion that this is a very wide case in which the govts are interested. These show false as an outpoint type.

The plaintiff stayed around too long for the action to have begun as a plot by outside interests. It is obviously a plot by him. He is PTS type III and has both mother and wife trouble.

As to receiving treatment, the record shows that he only received a little Dianetics and a quick pass on the ground. HE SPENT MOST OF HIS TIME IN ORGS INVOLVED WITH TRYING TO HANDLE HIS DOMESTIC LIFE AND DID NOT IN FACT RECEIVE FULL HANDLING. He would not straighten himself out so he could be audited. This is a point that can be made.

They refused refunds.

There must have been WAIVERS signed by both these people, possibly several times, that they were not engaged in anything but a religious activity. This is omitted from the file and from planning. That they omit this though it must be known to them is a falsification.



In actual fact all books used were 1950-51 and psychosomatic healing has not been part of any offering permitted by the Church.

Omitted is any defense for , not an officer or director, materials only for a term of good usage.

Falsified by the plaintiff is the corporate status, these churches being different corporations. The plaintiff having taken service from SIX organisations.

Omitted is the glaring fact that the plaintiff continuously engaged in several other practices per File A and could not be said to have suffered from one any more than the other.

The plaintiff falsified his first white Form, omitting the fact which later emerged, that he had been pronounced insane (probable) and incarcerated in an institution (certain) at the age of 7. and (probable) has been in one at other times, which fact is unknown. The plaintiff was hypnotised apparently on several occasions long before coming to the Church. The Church does not hypnotise so his complaint is false.

Plaintiff said he was crippled by an "explosion in mid brain" and alleges he could not work but when suspended at ASHO worked for 7 months on a tanker.

These and other facts demonstrate that one is handling TWO situations in this case. Thus the two separate evaluations follow, based on above outpoints.

#### GO SITUATION EVAL G1

Policy : Fully evaluate all major situations.

SITUATION G1: The GO US is apprehensive about the Goodrich suit and advocating measures which will not completely handle with certainty, but which depend on technical legal expertise - which they have and which they should employ and which they are employing.

DATA : As above.

STATS : Very good legal stats.

OUTPOINT COUNT : The primary outpoint is omitted data.

This outpoint occurs over and over and over and appears in the form of unutilised (omitted from use) data as well.

These outpoints in the majority occur in the area of Intelligence.

WHY : Intelligence Bu head not providing sufficient information even of a routine nature to permit legal to form solid reassuring planning that will lead to an inevitable win.

SECONDARY WHY : GO US is miscalling "Evaluation" and is doing brief off the cuff SITUATION-WHY-HANDLING write ups which are not pure evaluation and do not use outpoint counts or the Data Series in full.

IDEAL SCENE : US GO calm, confident and effective in all Bus.

HANDLING:

- A. 1. Continue the legal defence as it is proceeding as it is technically sound in its legal strategy and, considering that it is lacking even elementary Intelligence data, is buying enough delay to remedy lack of proper data and evaluation. LEGAL
  - B. 2. Run out all ARC Breaks, then w/hs of omission and commission on the head of Intelligence. Handle any personal problems that appear. Do this instantly. STAFF  
AUDITOR.
  - C. 3. Do the same for any other Intelligence personnel. STAFF  
AUDITOR.
  - D. 4. Promptly look over Intelligence and at once remedy any reason for their organizational troubles. GO US
  - E. 5. Get existing Int staff flat out at once on the Goodrich case. Augment or handle personnel/finance as needed so as not to upset any other operation. GO US
  - F. 6. Produce any and all data needed for a complete, sound, winning defence. INT BU HEAD
  - G. 7. Keep Legal continuously briefed. INT BU HEAD
  - H. 8. Method 4 and review all data re expertise in the Int Bu and as written for them especially. GO TRAINING  
OFFICER.
  - I. 9. Send an aide from Flag to instruct all US GO personnel on the Data Series. \_\_\_\_\_
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GO SITUATION EVAL G2

Policy : Win a case on its merits.  
Delay a case where the merits are indefinite or  
until the merits can be firmly established.

SITUATION : A suit has been brought against the O. of S.  
and several of its principals by a Robert Edmund Puthoff  
Goodrich in the superior court of California, County of  
San Francisco for personal "damages" and as a Class action,  
alleging "fraud" in books and advertising and seeking to  
blow up a common suit into an action far out of proportion  
to its merits, but which constitutes a damaging thing only  
if it is lost and makes a precedent.

DATA : See earlier summary.

STATS : Very good stats legally to date.

OUTPOINTS : The very numerous outpoints all add up to false  
outpoints. Even where omitted data occurs it is omitted for  
the purpose of falsification. This type of outpoint is  
almost exclusive in the count except of course the wrong  
target of suing O. of S.

WHY : Goodrich and his backers have entered upon a false  
project from false backgrounds, are falsifying testimony and  
records in the greedy hope of getting some cash.

SECONDARY WHY : Orgs being reasonable about PTS and refund  
policy and the handling of psychotics.

IDEAL SCENE : Case fully evaluated and the evaluation being  
pressed home effectively with an eventual win and useful  
only to close up holes and as example in PR, restrain  
further attacks.

HANDLING :

- J. 1. Legal to keep the opposition on the defensive  
and to obtain needed time by means now in use  
and as per current legal planning as contained  
in 3 June 73 (d) Strategy, with this single  
exception : Use Discovery along legal lines by  
all means, but augment it with File A 2 June  
73 Time Trauk and insist upon obtaining from  
Int further data and utilise it. See G2-A.  
Attached.

US LEGAL

- K. 1A. Strategy for defensive actions. See G2-AA

LEGAL

- L. 2. If the case comes to a hearing or trial,  
in addition to any other approach deemed  
by Legal to be effective, use G2-B  
attached.

US LEGAL

- M. 3. Lead as feasible the plaintiff or his associates into making statements in sworn deposition or under oath that can be shown to be false. Develop such data from Int and other records and lead them into asserting a thing that can be proven false, then prove it false and move for a charge of perjury. US LEGAL
- N. 4. Work the case into a criminal type counter charge by whatever means. US LEGAL
- O. 5. Counter sue on the basis of G2-C or with whatever other means turn up so as to make an example. US LEGAL
- P. 6. Work out a means of defense of in this and utilise it, preferably to get an early removal from being a defendant. See G2-6. US LEGAL
- Q. 7. Rapidly institute Steps 1 to 3 of the letter to M of 4 June 73 by B. D/G US
- R. 8. Compose, with Legal assistance a disclaimer that does not invalidate the work but explains that the Church, while it is perfectly at liberty to do so, does not engage in psychosomatic handling or accept persons for treatment of disease of insanity and offers spiritual and religious counseling and that the attainment of betterment is at the responsibility of the person himself; that the E-Meter does nothing by itself but serves only as a guide to ministers of the Church; that the author was recounting only observations as a consequence of his work and is not responsible for any promises or misuse of these materials etc; the import being that the person reads these works as his own responsibility. The purpose of this is to debar any slightest chance of being charged, Church or author, with Fraud. Design it handsomely like a book plate with space for the persons name on it "This book belongs to \_\_\_\_\_" at the bottom with plenty of space for the name and the type rather small. D/G US
- S. 9. Get this pasted into all books inside the front cover. All countries. D/G US  
CO WW



- T. 10. Start the E-meter legal disclaimer with "By itself, this meter does nothing. It is solely for the guide of ministers of the Church in Confessionals" then continue with the court wording, the two statements so placed that they appear to have different origins but are read together even if not placed together.

DC US  
GO WW

- U. 11. Complete and publish the religious bonafides.

DC US (with  
assistance).

- V. 12. Edit DMSMH, bringing it up to date, adding a discussion of intervening years and the role of the spirit. Reissue as a "New Book", D + 24.

WRITER.

- W. 13. Update the Garrison book and get it into print.

GO WW

- X. 14. Work out a letter campaign to handle all past neglected or hostile Sons.

GO WW

- Y. 15. Collect enormous numbers of existing identity connected success stories and select so as to cover actual gains stated as attainable in books and literature. Use in court. Publish as "Success with Son" with statements by the editor. "We didn't tell these people they could win" is the motif.

DC US  
Appointed  
Team.

- Z. 16. Review these programs and add targets that may be suggested or advised.

TARGET 1 - G2-A

The keynote of these people is falsity. This will not apply to just this suit. It will apply to their whole lives, past and present.

BRIGHT IDEA ONE-A for this target : By obtaining a deposition or interrogatory from LOIS GOODRICH or by other means utilise her fixation on govt agencies and Lazaro's false claims of Federal backing or his hopes from them, any connection between Goodrich and the FDA ex-head, and any actual evidence to either affirm or start rumors that this is a conspiracy, prompted by others who are not shown as actual plaintiffs, establish some illegal action by them, preferably theft of records, breaking and entering, taps, espionage within the orgs. Then use this with a blast of PR to "move for dismissal at once". See Letter A, 4 June 73, TIM.

- A. (a) Discover any connection between Goodrich and his possible FDA namesake.
- B. (b) Attain much further data on the connections of these people (i) credit rating (ii) past involvements (iii) suing others (iv) govt involvement (v) past criminal records (vi) source of finance for the suit (vii) any swindles as employee damages (viii) develop a rounded picture of these people, their finances and connections. Feed Legal the data as fast as developed.
- C. (c) Explore how to effect Bright Idea One A above, keeping in mind and USING at this stage the false ideas being fed in by Lois G and Lazarus and acting as if they were true and you believed them (for now).
- D. (d) Do the submissions, interrogatory, deposition steps necessary to develop and finally explode the case.

LEGAL BU

LEGAL BU

BRIGHT IDEA G2-B : Goodrich has a mental hospital record. Age of 7, also 1967. probably many more. Use this to get him labeled as incompetent civilly and not legally able to bring a suit, or use it to invalidate all testimony, and filings. see A, 2 June 73 Time Track.

- E. (e) Collect the records and evidence of the 7 year old mental home, the 1967 NY hospital, the 18 Sept 69 visit to Samuel Scarlet, MD 490 Post Street SFO, any other mental evidence, by legal means. Get it to Legal.



Tgt 1 - G2AB continued.

AF. (f) Obtain documents as listed below and give to Legal.

DC US

AG. (g) Compose the proper court submissions to move for dismissal on the grounds that the plaintiff is insane, that he falsified his application for service well knowing the insane and electric shocked case is not accepted for processing or service in the Church and knew also that he would be rejected if the fact became known. That his conduct while in the Church was that of an insane person (do not furnish his threat to wreck Sen as this must be masked until possible trial). And that the case should be dismissed because of mental incompetence of the plaintiff who has no grounds for suit. Infer this was reason for discontinuance of service but only infer it.

LEGAL BU

(Documents needed, PL on the insane, sample of waiver, WF. Not the waiver pc signed which is to be reserved for any trial).

BRIGHT IDEA : G2-C : Build up a mounting record of false utterances by the plaintiff, his wife, any others so that the atmosphere of total falsity can later be used in case of trial. Ask questions in additional depositions and interrogatories that are leading so as to provoke false answers which can later be shown to be false.

AH. (h) Locate anything false or of pretense in the Plaintiff's life or in that of his wife or mother. Give to Legal.

INT BU.

AI. (i) Work over all data to hand and see how it can be used to provoke false answers in depositions, etc. Use them.

LEGAL BU.

AJ. (j) Carefully list any and all false answers or statements made by the plaintiff or those connected with him, with place and date, particularly those given under oath but not omitting those made to other persons for eventual use, in case of trial.

LEGAL BU.

G2-AA  
TARGET 1A - DEFENSE ACTIONS.

It is too optimistic to suppose that the plaintiff will not have shut and muck to throw at Sen, bringing up all sorts of cases that have been on the outs, bringing up chain lockers and handcuffs, bringing in psychiatrists "expert testimony" and trying to make the press with shocking revelations. He may even release things to the press before they come to court in true Democratic fashion in the best tradition of Fascist Germany.

Therefore, these actions should be anticipated. They should be ruthlessly handled to GAIN ADVANTAGE IN PROVING EVENTUAL PERJURY as well as any other legal motive.

But be assured, it is my experience, that these charges are FALSE. Do NOT fall into the trap of believing orgs or Sons do these things unprovoked when they are done at all. Every investigation I have ever conducted (they are MANY) I have found that these entheta utterances and charges against orgs and people were FALSE, and even in the most grave ones, there were fantastic provocations.

In this sense of DEFENSE is where Intelligence (Information) and Legal must work fast and furious and hand in hand.

Aside from legal invalidative tech on such charges and setting them aside on technical grounds, THE STANDARD AND ONLY WORKABLE WAY OF HANDLING THIS MATERIAL IS BY WHAT IS CALLED "Dead Agenting". This is defined as it is in the old Chinese book of war : When an agent is found to be feeding the enemy false information, the enemy kills him : hence, "dead agenting". In our case it means this :

ASSUME AND PROVE THAT EVERY CHARGE BROUGHT IS FALSE AND GET THE DOCUMENTS AND WITNESSES AND DEPOSITIONS AND PROVE IT SO.

This means that any charge or allegation made can only be answered or handled after Intelligence has slashed out and gotten the documents to the contrary or contrary facts are demonstrated in or through witnesses.

AK. 1. Understand and use the above.

LEGAL BU.

AL. 2. Understand and use the above.

INT BU.

AM. 3. Ask for delays until the thing can be dead agented.

LEGAL BU.

AN. 4. Get the contrary evidence. DO NOT LET A SINGLE ENTHETA CHARGE GO BY ! DA IT !

INT BU.



G2-6  
TGT 6 Data : Suggested argument for an action that must be done.

There is no valid reason for            to be continued as a defendant in this suit. Petition to remove him must be made.

The facts are plain. He has not been a director or officer of any of these orgs since three years before Goodrich ever came near one.

He had no knowledge of Goodrich, as a case.

The books in question were written by            20 years and 19 years respectively before Goodrich came on the scene. They were written for publication. The copyright date alleged by Goodrich is false.

The books were written years before the Church was founded.

          has no control over the use of his books any more than any author has.

He wrote none of the advertisements offered.

His sole role in this is that of a writer of books nearly a quarter of a century ago. In all that time they, as books, have never been challenged and have been read by many, many people.

It is completely unconstitutional in the United States to charge a writer for writing books and will not stand up in any contest of law regardless of who sold or used the books.

The First Amendment guarantees freedom of speech and press.

Therefore his name should be struck from this suit as a defendant.

If the plaintiff disagrees, then            will have to initiate independent legal action against the plaintiff for libel and slander on constitutional grounds as            cannot legally be considered a party to this suit.

TARGET 2 - G2-B

This person has no case if it ever comes to trial, providing only that the hearings are extremely well prepared and continued on an attack line.

NOTE THAT AT THE BEGINNING OF A CHAPTER OF DMSMH (page 169 ?) it says people who have been damaged by psychiatry cannot be helped or are difficult to help. THIS IS THE WIPE OUT OF FRAUDULENT CLAIMS as he works hard to bring in this very book in his complaint;

Further he signed a waiver. Possibly several as he was in six orgs. He was informed we did not treat the insane or institutionalised yet hid this data. (See White Form). He was there on false pretences. He refused a refund.

Throughout his processing he had withholds and sweaty hands, most likely, which gives a low tone arm. He is a "low TA" case which means that he is easily directed or misdirected and very easily overwhelmed and will react very badly to badgering or anyone's refusal to accept what he says, which is valuable in face to face interrogation as he will blow up or collapse and will present a bad appearance. Carried in the right fashion during cross examination his blow up could be timed (by simple refusal to accept what he says and by asking the same question doubting his answer) to coincide with a point which would look like an admission of guilt and would be interpreted by a judge or jury as such, particularly if the interrogator remains very calm and pleasant: he will give the appearance of mental instability and guilt any time a cross examiner wishes.

- AO. 1. He has a long history of head injuries. See 4 June 73 A or (a) "Headache List". See 2 June 73A Time Track, White Form, pre-Son motorcycle accident (1 Feb 69 WF). Although he complains about this, it can be safely assumed, for legal purposes, that this is a fake. The org decided he was not for them, sent him to an MD apparently as on 18 Sept 69 we see Dr. Clark and Dr. Scarlet on the scene saying he had nothing wrong with his head. (Actually this is probably true, enough of a bet to permit a new medical exam which would also appear negative as to head. Actually he probably is diabetic which gives headaches of mysterious origin and turn on under stress, meaning these headaches took years to build up under a bad diet or drugs or alcohol abuse). For legal purposes, it can be established, within the competence of an MD at contemporary tech of medicine that there is nothing wrong with his head. They won't think of blood tests or secondary causes. HIS "HEAD TROUBLES" existed BEFORE auditing, that can be established; he was sent to a doctor to handle; he was offered refunds and refused them and forced himself back on the org; and is currently faking that there is anything wrong with his head. ALL THIS M U S T BE EARLY ESTABLISHED IN ANY TRIAL.



- AP. 2. He had constant troubles with his wife Gold and is undoubtedly being forced into the suit as her pawn. Women who interfere with husbands auditing want husband bad off, old stable datum. It can be established that his relationships with wife were awful, that she constantly interfered with his life (not his auditing as this point must be repressed for later reasons). Attribute his loss of income to his wife troubles establishing that by keeping him under stress he was unable to work. That cares for claims that Son prevented him from working. Actually he would really never get his life in shape to get audited and received very little actual auditing. Make the WIFE the villain for his income losses.
- AQ. 3. He is guilty not only of earlier practices but contacts with other practices during his time of bothering orgs. See 2 June 73 Time Track and records concerning these. It can easily be established by cross examination that he was concurrently engaged in other practices while he was badgering orgs. Thus any condition he has can as easily be attributed to engaging in other practices as to Son. Dale Carnegie, medicine, hypnotism with dentistry, neurology exist; you can be certain others also existed. Yet he seems to be fixated on blaming Son. THIS POINT MUST BE ESTABLISHED FOR THE WHAMO.
- AR. 4. He wrote two or more success stories in which he stated he did have gains. These can be dug up and presented. This is done to establish further his falsity. He will say they didn't last. Infer that this was his own irregular life.
- AS. 5. Now comes the piece de resistance that wins the fraud case. Locate the section in DMSMH the disclaimer as to the mentally ill. Locate the FLs that forbid treating the insane or the physically ill, locate the WFs which omitted his psychiatric history. Present these as exhibits. Unearth the full record of his earlier falsities. Establish that he was fully aware that he was the victim of psychiatry. Establish that he had read DMSMH. Introduce waivers he signed foregoing physical treatment. Establish that he actually knew the subject excluded him in its claims and that he falsified his attestation. Apply this to any other plaintiff. Establish by an exhibit of tons of success stories that it does work. Note that the Handbook claimed only for 88% of cases. That the Church does not use Dianetic claims per waiver. Establish that he refused refunds and that refunds were given his wife. Make the easily made point that he forced himself on six churches, was advised there was need to straighten out his life before he could be helped but did not admit to him he was classified under the insanity policy. Have the claims re fraud dismissed. And the suit..

- AT. 6. Now the piece de resistance the Class suit if it still hangs on. It is "On behalf of others similarly situated". This would include only those persons with a history of insanity who hid the fact and badgered the Church for service. All these people are weeded out when found, as per policy. And by waivers they sign and policies they are shown. If there is such a class any claim they have is as illegal as Goodrich's. Augment this as necessary. Have the class portion of the suit dismissed. And the suit.
- AU. 7. Here is the final whamo. Should the priest penitent privilege be waived, the session of 25 August 69 shows that, or can be made to show that, he PLANNED TO DESTROY THE ORG AND SCIENTOLOGY AND ONLY REMAINED IN IT TO DO SO for three years. The person who audited him can so testify. The report can be entered as an exhibit. That he is lying to the court and to others and that his wife and co-plaintiffs are engaged in inciting action against Son and by the Class Action itself, he is carrying out his plan. When this is done, his falsity has been established in earlier instances, his equivocations will be exposed, the full record of falseness should be entered as an exhibit, between now and the future time of this hearing there might be further threats of violence or action against the Church, these can be brought up as incited by Goodrich and his accomplices. That he is insanely bent on destruction and is a menace to society. Any instances of his efforts to destroy ships or people covertly that have been found can be included. The whole case should be dismissed and the suit. And damages awarded the defendant as well as all costs.
- AV. 8. Should for any reason the trial fail to dismiss, introduce First Amendment considerations as were originally planned for the trial strategy.
- AW. 9. If the First Amendment plea fails, appeal to a higher court, as there would have had to have been gross technical misbehaviour on the part of any judge who failed to dismiss this at one stage or another. BE SURE TO KEEP A RUNNING RECORD OF SUCH TECHNICAL FLAWS ON THE PART OF THE COURT OR PLAINTIFF IN CASE IT IS NECESSARY TO APPEAL.
- AX. 10. Retry the case in the higher state court fully.
- AY. 11. If the state court fails, on the basis of the fact that the Plaintiff alleges complaints against five different organisations one of which is in another state, and as it raises Constitutional issues and was mis-tried, take it to the lowest Federal Court nearby.



IX. 12. If for any reason the matter fails in that court, by continuing record of technical flaws, take it to a high Federal Court. By this time you would be trying the legality of Class Actions themselves as, unlike others, we cannot settle out of court, and few if any Class actions actually have come to trial. Thus it will be possible to go higher.

(In the meantime, there is hope that Class Actions may have become illegal and that this suit has been brought as a Class Action in the first place destroys it utterly. But don't count on it).

EA. Constant alertness must be kept at all stages of this suit for perjury. This is the key to it. You will find that (a) THEY DO NOT KNOW WHAT YOU KNOW OR HAVE RECORDS OF. (b) Their strategy will not be perfect and the general strategy of attack envisioned at first probably won't materialise but other odd ball things will. (c) Their first perjuries should be let pass as they will be small. This will embolden them. (d) As soon as you have several small ones and a reliable big one, MOVE TO CHARGE FOR PERJURY and dispose of the case by using the falsity of the plaintiffs against them in this fashion.

EB. The moment you have a dismissal, work then not just for costs but for some uproar so that you have PR in the win. Do something freakish as soon as the dismissal is sound, such as some extravagant demands such as (a) move for arrest of all persons connected with the plaintiff (b) put in an outrageous cost figure (c) put in a one billion dollar damages claim against all members of the class who supported him, thus seeking to create a precedent that makes a class suit filing dangerous (d) include in the damage demands any govt dept or agency you have any trace of in the case (e) give an amnesty to any news agency that was carrying anti Sen press on it in such a way as to give them a shock of relief, but in return for the favourable win. This is PR BU \_\_\_\_\_ The rest of this tgt is LEGAL.

EC. Review the whole case to establish any line of attacks or patterns revealed by this suit and act to cancel them as effective lines. See burning the folders: hard news stories at SN in late 60s.

DG US

ED. Develop and invent into hard news blockers or cancellers or invalidators of such lines of attack.

PR BU

EE. CAUTION ON TRIAL. Do not let the plaintiff derange your line of attack. Handle his efforts and always come back to the next stage of yours.

EF. Do not expose any of this planning in any way or data connected with the trial strategy until the actual trial, if any.

END OF EVALUATION.



8 June 75

The Goodrich Suit Evaluation  
( Addition 1 ).

Page 5.

PP. Add 1B; as already mentioned in strategy, make the suit as expensive as possible for them. But to this include, as inexpensive as possible for us so its expense does not unduly absorb funds and thus curtail other needful actions elsewhere. One of the ways of making it expensive for them is used abroad and may be worked out for the US : i.e. the financial competence and financial responsibility of the plaintiff is continuously challenged such as on the grounds of being transient, or often shifting jobs or heavily in debt, thus making recovery of damages for the expense he is causing impossible; this leads to examination of his finances for the suit for one thing; but abroad bond after bond can be demanded, demurrers can be filed to taking depositions required of one on the grounds of expense and new challenges of financial responsibility can be made every time with new bonds. The plaintiff is the one causing the trouble and he is NOT financially responsible at all. The attorney's source of funds can thus be traced. Change of venue can be re-pleaded at every pretext and also on these grounds of financial burden. In each such filing one drives home the irresponsible falsity and the insane character of the plaintiff, questioning any legal rights at all and repeating this was the reason the Church refused him service. Work out other ways of causing them expense. And in one or more of these discover an already existing improper use of funds or malfeasance in the plaintiff's or Lazarus' methods of obtaining funds such as false promises to other claimants. Steer it into a financial crime case as feasible.

LEGAL BU

PQ. Add 1 C Intel (Information Bu) to obtain legally information as to how funds are being contributed and to find the evidence that the suit, in fact, is just a means of shaking down other claimants, a sort of side swindle by the plaintiff and attorney.

INT BU.

PR. Add 1 D There is some possibility that Lois Goodrich and Lazarus would get rid of Goodrich. The pair may have something going and plan something about Goodrich whereupon his demise is used to prove he had been harmed. There is something wrong in that set up. Find it. Legally.

INT BU.

Page 6 & Page 9B.

Target 6 and its suggested Data. . REVISION.

If in legal opinion this will open the door to putting too solidly into the case, use this only if the plaintiff brings it up, or lead in to get a removal only when the plaintiff says clearly that it is only about books that is named as one of the defendants. If the plaintiff could be led to state that, then a possible move for removal could be attempted.

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